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April 17, 2014

VIA HAND & ECF DELIVERY

Hon. Richard M. Berman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, N.Y. 10007-1312

RE: U.S. v. DINESH D'SOUZA, 14 CR. 034 (RMB)

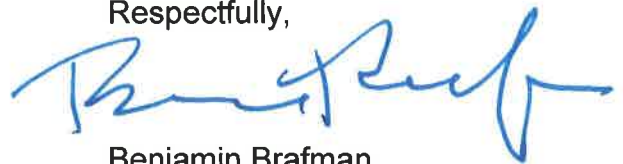
Dear Judge Berman:

We enclose pre-trial motions filed by the defendant Dinesh D'Souza.

We do not adopt the Government's Verdict Sheet, nor do we join in certain of the Government's Requests to Charge. We will file a joint set of materials by April 24, 2014 as per the schedule agreed to with the Court. We will also respond at that time to the Government's Motion in Limine and pursuant to Rule 24, will also provide the Court with several specific questions to include when questioning prospective jurors.

Thank you for the courtesy extended to counsel in this matter.

Respectfully,



Benjamin Brafman

cc: Carrie Cohen, Assistant United States Attorney (via email: Carrie.Cohen@usdoj.gov)

Dinesh D'Souza